

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN  
MILWAUKEE DIVISON

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JOSE ACEVEDO, individually, and as  
Special Administrator of the Estate of  
JOEL ACEVEDO;

*Plaintiff,*

v.

MICHAEL MATTIOLI, et al.,

*Defendants.*

**CASE NO. 23-cv-00489**

**JURY TRIAL DEMANDED**

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**PLAINTIFF'S MOTION IN LIMINE TO EXCLUDE  
DR. JIMMIE L. VALENTINE AND DR. JEFFREY M. JENTZEN'S  
EXPERT OPINIONS AND TESTIMONY DUE TO UNTIMELY  
SERVICE OF DEFICIENT DISCLOSURES WITHOUT LEAVE OF COURT**

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NOW COMES JOSE ACEVEDO, individually, and as special administrator of the ESTATE OF JOEL ACEVEDO, by and through his counsel, B'IVORY LAMARR, ESQUIRE, of the law firm of B'IVORY LAMARR TRIAL LAWYERS; DEVON M. JACOB, ESQUIRE, of the law firm of JACOB LITIGATION, INC.; and BENJAMIN L. CRUMP, ESQUIRE, of BEN CRUMP LAW, PLLC, and respectfully requests that the Court grant Plaintiff's Motion In Limine to Exclude Dr. Jimmie L. Valentine and Dr. Jeffrey M. Jentzen's Expert Opinions and Testimony Due to Untimely Service of

Deficient Disclosures Without Leave of Court. In support thereof, Plaintiff relies on the arguments as set forth in his Brief and the Exhibits filed in support of this Motion.

Undersigned counsel (Jacob) certifies that counsel for Mattioli does not concur in the filing of this motion.

**WHEREFORE**, it is respectfully requested that the Court grant Plaintiff's Motion In Limine to Exclude Dr. Jimmie L. Valentine and Dr. Jeffrey M. Jentzen's Expert Opinions and Testimony Due to Untimely Service of Deficient Disclosures Without Leave of Court.

**Respectfully Submitted,**

By: /s/ B'Ivory LaMarr  
**B'IVORY LAMARR, ESQUIRE**  
Wisconsin Bar No. 1122469  
blamarr@lamarrfirm.com  
THE LAMARR FIRM  
5718 Westheimer Road, Suite 1000, Houston, TX 77057  
800.679.4600, Ext. 700

**Date: August 22, 2025**

By: /s/ Devon M. Jacob  
**DEVON M. JACOB, ESQUIRE**  
Pennsylvania Bar No. 89182  
djacob@jacoblitigation.com  
JACOB LITIGATION, INC.  
P.O. Box 837, Mechanicsburg, Pa. 17055-0837  
717.796.7733

**Date: August 22, 2025**

**KIRK M. CLAUNCH, ESQUIRE**  
Texas Bar No. 1039975  
[claunchlaw3@earthlink.net](mailto:claunchlaw3@earthlink.net)  
**THE CLAUNCH LAW FIRM**  
301 W. Central Avenue, Forth Worth, TX 76164  
817.335.4003

**BENJAMIN L. CRUMP, ESQUIRE**  
Washington, D.C. Bar No. 1552623  
[court@bencrump.com](mailto:court@bencrump.com)  
**PRECIOUS CHAVEZ, ESQUIRE**  
[precious@bencrump.com](mailto:precious@bencrump.com)  
**BEN CRUMP LAW, PLLC**  
122 S. Calhoun Street, Tallahassee, FL 32301  
800.959.1444

*Counsel for Plaintiff*